

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

<b>IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>  <b>HON. ROBERT B. KUGLER</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	

**AMENDED NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION**

TO: **Clem C. Trischler, Esq,**  
**PIETRAGALLO GORDON ALFANO BOSICK & RASPANTI, LLP**  
**38<sup>TH</sup> Floor, One Oxford Centre**  
**Pittsburgh, Pennsylvania 15219**  
*Attorneys for Defendants Mylan Pharmaceuticals Inc. (hereinafter "Defendants").*

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Daniel Snider, Head of Global Quality Systems/QA IT Technical Quality, on March 31, 2021, at 9:00 a.m. eastern standard time, and continuing until completion, at Pietragallo Gordon Alfano Bosick & Raspanti, LLP, 38<sup>th</sup> Floor, One Oxford Center, Pittsburgh, Pennsylvania 15219, via zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The deposition shall address the Federal Rule of Civil Procedure 30(b)(6) topics listed on Exhibit A attached. The witness shall produce the documents requested at Exhibit B, attached hereto, at least 5 days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

**TAKING ATTORNEYS FOR PLAINTIFFS:**

JOHN DAVIS  
Slack Davis Sanger LLP  
6001 Bold Ruler Way, Ste 100  
Austin, TX 78746  
Telephone: 512-795-8686  
Fax: 512-795-8787  
[jdavis@slackdavis.com](mailto:jdavis@slackdavis.com)

The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

March 24, 2021

**PLAINTIFFS' CO-LEAD COUNSEL**

By: /s/Ruben Honik, Esq.  
RUBEN HONIK, ESQ.  
Golomb & Honik, P.C.  
1835 Market Street, Ste. 2900  
Philadelphia, PA 19103  
Telephone: 215-327-9166  
[ruben@honiklaw.com](mailto:ruben@honiklaw.com)

**EXHIBIT A**

**30(B)(6) TOPICS**

*On behalf of Mylan Pharmaceuticals Inc.:*

*Testing*

1. The cause of the contamination of Mylan's valsartan API with nitrosamines, including, but not limited to, NDMA and NDEA.
2. The root cause investigation for the nitrosamine impurities, including NDMA and NDEA in the Mylan API.
3. Any assessment or root cause analysis conducted by Lantech Pharmaceuticals with regards to NDMA and NDEA contamination in recycled or recovered solvents.

*Process Development*

25. The development of each Drug Master File for Mylan's valsartan API sold in the United States, including any risk assessments conducted on starting materials, or solvents.
26. The use of solvents, and the Tetrazole ring formation step, in the manufacturing process for Mylan's valsartan API, including: (1) the reasons for each, and any modifications, (2) the testing and evaluation in connection with each, including any modification, and (3) the relationship between each, including any modifications, and the nitrosamine contamination of Mylan's valsartan API, (regardless of intended sale location) in any facility that manufactured Mylan's valsartan API for sale in the United States.
27. Any evaluation conducted by or on behalf of Mylan with regard to health or safety issues arising from the use of solvents, and the Tetrazole ring formation step, in the manufacturing process for Mylan's valsartan API (regardless of intended sale location) in any facility that manufactured Mylan's valsartan API for sale in the United States.
28. Mylan's evaluation and knowledge of the risk of the creation of nitrosamines including NDMA and NDEA as a result of the manufacturing process for Mylan's valsartan API.
29. Mylan's evaluation and knowledge of the risk of using recovered or recycled solvents in the Tetrazole ring formation step, in the manufacturing process for Mylan's valsartan API.

**EXHIBIT B**

**DOCUMENT REQUESTS**

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Daniel Snider, Ph.D.
2. The complete production of Daniel Snider's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 24, 2021, I caused the foregoing to be electronically filed with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

PLAINTIFFS' CO-LEAD COUNSEL

By: /s/ David J. Stanoch  
DAVID J. STANOCH  
Kanner & Whiteley, L.L.C.  
701 Camp St.  
New Orleans, LA 70130  
Telephone: 504-524-5777